

To: Olsberg, Colleen[olsberg.colleen@epa.gov]
From: Egan, Robert
Sent: Mon 1/5/2015 1:43:29 PM
Subject: FW: Former Clark Station #823, Mt. Pleasant, MI, status
Premcor 823 6-2014 GWS with 11-14 amendments.pdf

Colleen.

Please take a look at the revised table and let me know how it looks. I will also forward the second round results.

Thank you,

Bob

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

RCRA Branch

(312) 886-6212

(312) 692-2911 (fax)

From: Bill Karban [mailto:bkaran@envirosolutionsinc.net]
Sent: Tuesday, November 18, 2014 3:56 PM
To: Egan, Robert
Subject: RE: Former Clark Station #823, Mt. Pleasant, MI, status

Bob,

I amended the table, as requested by your Risk Assessor. I will give you a call later on this week.

Thanks,

Bill

From: Egan, Robert [<mailto:egan.robert@epa.gov>]
Sent: Thursday, October 16, 2014 9:37 AM
To: Bill Karban
Subject: RE: Former Clark Station #823, Mt. Pleasant, MI, status

Hi Bill,

Thanks for getting back to me on the Clark site. Please see the comments below from our risk assessor.

After you have a chance to look at them, contact me if you have any questions.

Regards,

Bob

Comments:

Per your request, I have been reviewing the groundwater data from the Mt. Pleasant Clark Station. There is a problem with the screening levels for the vapor intrusion pathway (both residential and nonresidential) used to compare to groundwater data. The vapor intrusion screening levels used were from MDEQ September 28, 2012. There has since been an update to these vapor intrusion screening levels (3/19/2013).

Unfortunately, there is a (sometimes significant) difference between these two sets of vapor intrusion screening levels. See below for examples.

	2012 vi screening levels (nonresidential) screening levels (nonresidential)	2013 vi
Benzene 1.4E2	3.5E4	
Toluene 1.5E5	5.3E5	
Ethylbenzene 2.6E3	1.7E5	

My recommendation is that the facility should use the updated vapor intrusion screening levels for comparison to groundwater data, and then resubmit the document for review.

Some information on screening levels is below. This should help your facility when they revise their document.

1. The Final DEQ VI Guidance document is now dated May 2013. See the following link to the Guidance where the VI screening levels are listed in Appendix D.1 and Appendix D.2

http://www.michigan.gov/documents/deq/deq-rrd-VIGuidanceDoc-May2013_422550_7.pdf

2. Residential and Nonresidential Groundwater Criteria” are in link below. These are the current Criteria until MDEQ completes the next round of their official review process.

http://www.michigan.gov/deq/0,4561,7-135-3311_4109_9846_30022-251790--,00.html#noprint

Bob Egan

Corrective Action Manager

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From: Bill Karban [<mailto:bkarban@envirosolutionsinc.net>]
Sent: Monday, October 13, 2014 1:09 PM
To: Egan, Robert
Subject: RE: Former Clark Station #823, Mt. Pleasant, MI, status

Hello, Bob.

Checking in with you on this site. Could you fill me in on the status?

Thanks,

Bill Karban, LPG

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From: Egan, Robert [<mailto:egan.robert@epa.gov>]

Sent: Tuesday, July 29, 2014 9:45 AM

To: Bill Karban

Subject: RE: Former Clark Station #823, Mt. Pleasant, MI, status

Bill,

I received the report and will review the groundwater data. Please contact me in four weeks if you don't hear back from me before that time. Site work has me tied up with other facility reviews, etc., but I should be able to review the report and speak to our risk assessor about the results within that time.

Regards,

Bob

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

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From: Bill Karban [<mailto:bkarban@envirosolutionsinc.net>]
Sent: Thursday, July 24, 2014 6:02 PM
To: Egan, Robert
Cc: 'Draper, Rick'
Subject: Former Clark Station #823, Mt. Pleasant, MI, status

Bob,

Please see the attached summary of groundwater sampling activities at the reference site. Per our discussion, we would like to proceed with discussions regarding an appropriate institutional control for the site and the path to regulatory closure of the LUST release.

Thanks again for your assistance with this matter.

Sincerely,

Bill Karban, LPG

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